

TIME SHEET

Time through administrative proceeding

DATE	TIME (hrs.)	ACTIVITY
3/21/2014	0.40	Telephone conversation with expert (A. Lipshin, APL) about letter from D. Hokit, SPS attorney, and matters relating to the development of M.M.'s IEP for next school year
	0.20	Draft email to D. Hokit, SPS attorney, re SPS performing an FBA at APL and its records request
3/26/2014	0.25	Review and assist client in drafting revision to consent for reevaluation form from SPS; and explanatory cover email to client
4/16/2014	0.25	Phone conversation with expert (A. Lipshin) re records request; Draft email to D. Hokit, SPS attorney re late settlement check and retrieval of APL records for which SPS requested copies
4/18/2014	0.20	Review and respond to client email re proposed testing by Sherrie Studley, SPS
4/30/2014	0.20	Telephone conversation with expert (A. Lipshin) about SPS' BCBA observation; curriculum--based testing and planning for IEP; and draft follow-up email to client about this
5/2/2014	1.25	Telephone conversation with experts (A. Lipshin and S. Malmquist, Ph.D) about IEP contents and process of developing IEP
5/5/2014	0.25	Draft email to client summarizing 5/2/14 discussion with experts
	0.30	Telephone conversation with client re conference call with experts (A. Lipshin & S. Malmquist) and next steps required to prepare for IEP meeting
5/7/2014	0.20	Telephone conversation with expert (A. Lipshin, APL) re records and request by SPS' SLP to observe M.M. in his program the following day
5/18/2014	0.30	Draft email to client about pressing SPS for a commitment and IEP meeting; and draft email to D. Hokit, SPS attorney, about this
7/10/2014	0.25	Telephone conversation with expert (A. Lipshin) re contents for IEP for M.M.; follow-up email to client
	0.25	Telephone conversation with client about visits to SPS schools (Thornton Creek/View Ridge Elementary) and scheduling of IEP meeting
	0.15	Draft email to SPS attorneys re need for records relating to SPS evaluations at APL this Spring
7/25/2014	0.20	Telephone conversations with client and expert (A. Lipshin, APL) re scheduling of IEP meeting
8/8/2014	0.50	Review SPS' draft IEP
	0.25	Discussion with client about SPS' sudden cancellation of meeting scheduled for Monday and where proposal SPS seems to be heading with its placement
8/30/2014	0.15	Review Assessment of Functional Living Skills (AFLS) report from APL received from client;
	0.25	Follow-up conversations with client and expert (A. Lipshin) regarding additional information needed for IEP meeting
9/1/2014	1.25	Review SPS draft IEP and compare to previous SPS proposal, last year's SPS IEP and last year's parent-proposed IEP contents
	0.30	Telephone conversation with client about strategy for IEP meeting
9/2/2014	0.65	Meeting with clients, experts (A. Lipshin & Nicolle Simon from APL) re contents of M.M.'s IEP
	3.50	IEP meeting at APL with clients, SPS team and APL representatives
9/4/2014	1.00	Draft letter to D. Hokit, SPS attorney re proposed IEP contents as he requested at meeting and asking again for SPS to contract with APL
9/13/2014	1.50	Draft list of program attributes for expert (S. Malmquist) to look for when visiting Thornton Creek
9/23/2014	0.10	Telephone conversation with client regarding school observation.email from S. Studley,

DATE	TIME (hrs)	ACTIVITY
		SPS representative to discuss returning M.M. to SPS
	0.25	Telephone conversation with expert (S. Malmquist) regarding observations at Thornton Creek and APL; Draft follow-up email to client about this
9/24-25/2014	5.25	Assist client on drafting of comment/input on "final" SPS IEP proposal of 9/16/14
9/26/2014	0.40	Telephone conversation with expert (A. Lipshin) about SPS proposed IEP of 9/16/14
9/29/2014	0.30	Telephone conversation with expert (Bridget Sachse, M.S.) about her OT services and M.M.'s needs
9/30/2014	0.50	Assist client to revise comment/input on SPS IEP based on conversation with Bridget Sachse, OT
10/5/2014	0.20	Review and respond to 10/5/14 email from client re SPS' cancellation of school visit, and planning for meeting SPS scheduled for 10/7/14
10/6/2014	1.50	Telephone conference with expert (S. Malmquist) and client re observations at Thornton Creek and APL
10/7/2014	1.00	Meeting at Thornton Creek Elem. with SPS team and attorney to discuss M.M.'s transition to school there
	0.60	Review SPS proposed IEP of October 4, 2014 to identify extent to which it incorporates client's content requests
10/16/2014	0.25	Review letter emailed by D. Hokit, SPS attorney, about SPS' proposal to develop plan for transition to Thornton Creek and the possibility it will pay for M.M. to attend APL through Jan 5, 2015
10/17/2014	0.20	Telephone conversation with client re SPS' statement of intention re reimbursement and its transition proposal
10/24/2014	0.75	Review cost/payment statement from APL; Draft response to D. Hokit's letter regarding SPS' offer for transition plan and payment of APL costs through Jan 5.
11/24/2014	0.25	Draft email to D. Hokit, SPS attorney, re timeline for progress on resolution after which hearing request will be prepared and filed
12/4/2014	0.75	Draft hearing request: Background/school proposals & history
	1.50	Draft hearing request: Evaluation and IEP of June 2013
	0.50	Draft hearing request: School proposals & history 2013-14
12/5/2014	0.50	Draft hearing request: SPS reevaluation of Spring 2014
	3.00	Draft hearing request: SPS proposed IEP of fall 2014
12/6/2014	0.75	Draft hearing request: SPS proposed IEP of fall 2014
	1.25	Draft hearing request: SPS proposed program at Thornton Creek
12/7/2014	0.50	Draft hearing request: Revisions to SPS proposed IEP of fall 2014
	0.75	Draft hearing request: Program at APL
	0.25	Draft hearing request: Request for relief
12/8/2014	0.50	Telephone conversation with client re hearing request; revise hearing request accordingly
1/5/2015	1.30	Prepare for and participate in prehearing phone conference with ALJ & SPS attorneys
1/26/2015	0.30	Draft list of potential hearing witnesses and email to client explaining rationale for inclusion of witnesses on the list
	0.25	Telephone conversation with expert (Susan Malmquist, Ph.D) re hearing testimony
2/2/2015	2.00	Identify hearing issues and the witnesses to address each of them at the hearing
	0.75	Telephone conversation with expert (A. Lipshin, APL) about the general nature of her hearing testimony; Draft follow-up email to client
	0.30	Telephone conversation with client about witnesses and other hearing-related matters
2/4/2015	2.25	Review documents to select potential hearing exhibits (identify relevant contents)
2/6/2015	2.50	Review documents to select potential hearing exhibits (identify relevant contents)
2/7/2015	0.30	Telephone conversation with client about hearing witnesses and evidence to be presented at hearing

DATE	TIME (hrs)	ACTIVITY
2/9/2015	0.20	Telephone conversation with expert (A. Lipshin) about APL's program to secure information for hearing
2/10/2015	0.40	Telephone conversation with expert (A. Lipshin) about APL's program to secure information for hearing
	0.20	Draft email to client with list of potential exhibits and information about tasks needed to be done to prepare for hearing
2/12/2015	1.00	Draft hearing brief; Introduction/background
	0.25	Draft hearing brief; Relevance of past history/events
2/13/2015	0.30	Telephone conversation with J. Annabel, APL principal, to obtain general information about APL for hearing
2/15 & 16/2015	3.50	Prepare direct examination of expert (A. Lipshin, APL)
2/17/2015	2.00	Meet with expert (A. Lipshin, APL) to prepare for direct examination
2/20 & 21/15	3.50	Prepare for direct examination of experts (A. Lipshin & N. Simon, APL)
2/22/2015	3.00	Prepare for direct examination of experts (A. Lipshin & N. Simon, APL)
2/23/2015	0.75	Telephone conversation with expert (A. Lipshin, APL) regarding her hearing testimony
	3.00	Review records from APL & prepare for direct examination of expert witnesses from APL
2/25/2015	0.20	Telephone conversation with expert (Amy Jackson, OT) regarding her hearing testimony
	1.75	Prepare for direct examination of expert witnesses (S. Malmquist, N. Simon, A. Lipshin)
2/26/2015	1.50	Prepare for direct examination of expert witness (A. Jackson)
	0.75	Prepare for direct examination of expert witnesses (N. Simon, A. Lipshin)
2/27/2015	2.00	Meet with experts (A. Lipshin & Nicolle Simon, APL) to prepare for hearing testimony
3/1/2015	1.75	Prepare for direct examination of all experts witnesses: Check for coverage of facts/opinions relating to all hearing issues
	0.20	Draft email to client with update about hearing preparation and testimony by occupational therapists
3/2/2015	0.50	Telephone conversation/emails with expert witness (A. Jackson, OT) about hearing preparation; review A. Jackson's CV, evaluation report, and therapy goals
3/3/2015	0.25	Telephone conversation with client about hearing preparation and strategy
	2.50	Prepare for direct examination of expert (S. Malmquist Ph.D)
3/4/2015	2.75	Prepare for direct examination of expert witnesses (A. Lipshin, N. Simon, S. Malmquist)
	2.50	Meeting with experts (A. Lipshin, APL & S. Malmquist) to prepare for direct examination
3/5/2015	1.50	Select hearing exhibits and prepare for direct examination of experts (A. Lipshin & N. Simon, APL)
3/7/2015	0.50	Telephone conversation with client about hearing issues relating to occupational therapy and witnesses; preparation for testimony
	1.50	Prepare for direct examination of expert (Amy Jackson, OTR/L)
	2.00	Review records to select exhibits for hearing
3/8/2015	2.00	Review records to select exhibits for hearing and identify relevant contents
	2.75	Prepare for direct examination of parents and experts (A. Jackson, OTR/L, B. Sachse, OTR/L)
3/9/2015	1.20	Meet with expert witness (A. Jackson, OTR/L) to prepare for her direct examination
	1.75	Meet with clients to prepare for direct examination
	1.00	Prepare for direct examination of expert (A. Jackson, OTR/L) based on interview with her
3/10/2015	0.30	Telephone conversation with expert (B. Sachse, OTR/L) about her hearing testimony
	0.75	Review records to select exhibits for hearing and identify relevant contents
	2.50	Prepare for direct examination of parent
	0.40	Draft letter to D. Hokit, SPS attorney, about conferring to determine joint exhibits per prehearing order
3/11/2015	0.25	Telephone conversation with client about OT testimony and hearing schedule
	1.25	Prepare for direct examination of expert (N. Simon, APL)
	2.00	Meet with expert (N. Simon, APL) to prepare for her direct examination

DATE	TIME (hrs)	ACTIVITY
3/12/2015	1.25	Prepare for direct examination of expert (N. Simon, APL)
	0.30	Draft email to D. Hokit, SPS attorney, about discovery request made by SPS representative (S. Studley) and the need to confer to resolve issue
3/13/2015	1.00	Draft preliminary list of hearing witnesses as required by prehearing order
3/16/2015	0.40	Draft preliminary list of hearing exhibits as required by prehearing order
	0.30	Telephone conversation with D. Hokit, SPS attorney, about hearing exhibits records requests
3/17/2015	0.25	Draft hearing brief; Relevance of past history/events
	0.50	Draft hearing brief; Relevance of reevaluation and IEP of June 2013
	0.25	Draft hearing brief; Consideration limited to services in IEP
3/18/2015	1.00	Draft hearing brief; Consideration limited to services in IEP
	0.75	Draft hearing brief; Consideration limited to reasons for SPS actions in its response to complaint
	0.40	Telephone conversations with D. Hokit, SPS attorney and clients about SPS' discovery requests and hearing exhibits
3/20/2015	0.25	Draft hearing brief; Consideration limited to reasons for SPS actions in its response to complaint
	2.00	Draft hearing brief: Least restrictive environment requirement
	2.75	Review records for contents for direct/cross examination & prepare for direct examination of parents
3/21/2015	0.50	Telephone conversation with expert (S. Malmquist, Ph.D) re testimony
	0.40	Review records from APL provided in response to SPS' discovery request
	3.25	Complete selection of exhibits and preparation of list of witnesses and exhibits
3/22/2015	0.30	Telephone conversation with expert (B. Sachse, OTR/L) about her hearing testimony
	0.50	Draft hearing brief: Least restrictive environment requirement
	0.75	Draft hearing brief: Conclusion
3/23/2015	1.00	Review and revise/edit entire brief
	0.35	Draft email to D. Hokit, SPS attorney about APL records it sought and the SPS/consultant records that the parents requested
3/24/2015	0.65	Preliminary review of SPS' list of witnesses and exhibits
	0.25	Prepare for direct examination of expert (S. Malmquist, PhD)
	2.00	Prepare for cross-examination of SPS' witnesses
	2.00	Review records produced by APL pursuant to SPS' discovery request to prepare for sending to SPS' attorney
	1.00	Select exhibits to send to expert OTs (A. Jackson, B. Sachse) to comply with requirement for the exhibits to be available during their telephone testimony; draft explanatory cover letter
3/25/2015	2.00	Prepare for direct examination of experts (S. Malmquist, A. Lipshin, N. Simon)
	1.50	Meeting with experts (S. Malmquist, A. Lipshin) to discuss SPS' exhibits, prepare for presentation of case
	1.25	Draft motion in limine
3/26/2015	1.50	Complete drafting of motion in limine
	3.00	Meet with experts (A. Lipshin & N. Simon, APL) to prepare for direct examination
3/27/2015	3.50	Prepare for direct examination of parents
	1.30	Telephone conversation with expert (S. Malmquist, PhD) to finalize direct examination
3/28/2015	2.75	Meet with client to prepare for hearing testimony
	2.00	Prepare for hearing testimony of client
3/29/2015	0.50	Prepare for direct examination of client
	2.00	Final hearing preparation: Prepare opening statement, outlines of information in records to use in cross-examining witnesses

DATE	TIME (hrs)	ACTIVITY
3/30/2015	6.25	Hearing at SPS administration building (Testimony of A. Jackson, OTR/L & Parent)
	0.40	1/2 travel to and from hearing
	1.50	Prepare for direct examination for following day's hearing witnesses
3/31/2015	7.00	Hearing at SPS administration building (Testimony of N. Simon, S. Malmquist)
	0.40	1/2 travel to and from hearing
	0.50	Prepare for following day's hearing testimony
4/1/2015	6.00	Hearing at SPS administration building (Testimony of A. Lipshin, S. Malmquist, B. Sachse, OTR/L)
	0.40	1/2 travel to and from hearing
	2.00	Prepare for cross-examination of SPS witness (S. Studley)
4/2/2015	5.00	Hearing at SPS administration building (Testimony of S. Studley, T. Swanson)
	0.40	1/2 travel to and from hearing
4/3/2015	0.50	Telephone conversation with expert (A. Lipshin, APL) about rebuttal testimony
	0.30	Draft email to SPS attorney re parents' position on stipulation concerning expert support to Thornton Creek staff
4/4/2015	3.50	Prepare for cross-examination of SPS witnesses (T. Swanson, K. Prosch-Jensen)
4/5/2015	3.50	Prepare for cross-examination of SPS witnesses (T. Swanson, K. Prosch-Jensen, C. Nitz, & Bryant)
4/6/2015	4.00	Hearing at SPS administration building (Testimony of T. Swanson, S. Celms, Cook)
	0.40	1/2 travel to and from hearing
4/7/2015	4.50	Hearing at SPS administration building (Testimony of K. Prosch-Jensen)
	0.40	1/2 travel to and from hearing
	2.00	Prepare for rebuttal testimony by expert (interview A. Lipshin, APL)
4/8/2015	2.25	Hearing at SPS administration building (Testimony of A. Lisphin, S. Malmquist, & Parent)
	0.40	1/2 travel to and from hearing
	0.50	Prepare for rebuttal testimony by expert (interview S. Malmquist, PhD)
4/9/2015	3.25	Legal research/draft post-hearing brief: Introduction (including applicable laws)
	1.75	Draft post-hearing brief: Proper weight to be afforded witnesses
4/10/2015	2.00	Draft post-hearing brief: Proper weight to be afforded witnesses
	2.75	Draft post-hearing brief: SPS' June 2013 evaluation is inappropriate
	1.00	Draft post-hearing brief: SPS' spring 2014 evaluation is incomplete and inappropriate
4/11/2015	4.75	Legal research/draft post-hearing brief: SPS fall 2014 IEP is inappropriate
4/12/2015	3.75	Legal research/draft post-hearing brief: SPS fall 2014 IEP is inappropriate
4/13/2015	1.25	Draft post-hearing brief: SPS fall 2014 IEP is inappropriate
	4.25	Legal research/draft post-hearing brief: APL is the student's appropriate placement (predetermination; placement based on IEP)
4/14/2015	3.25	Legal research/draft post-hearing brief: APL is the student's appropriate placement (Least restrictive environment)
4/15/2015	3.75	Legal research/draft post-hearing brief: APL is the student's appropriate placement (attainment of goals; harmful effects; location)
4/16/2015	5.00	Legal research/draft post-hearing brief: Remedies sought are available and appropriate (compensatory education; reimbursement; prospective relief)
4/17/2015	0.75	Draft post-hearing brief: Conclusion
	4.00	Review, revise and edit entire brief
5/4/2015	0.50	Review and draft response to email from Judge Mentzer re supplemental briefing on issue of whether the stipulation modifies the issues for the hearing

DATE	TIME (hrs)	ACTIVITY
5/11/2015	0.40	Draft Supplemental Post-hearing brief requested by Judge Menzer on effect of stipulation on issue of the appropriateness of SPS' June 2013 reevaluation
6/12/2015	1.25	Review hearing decision and follow-up conversation with client
6/13-22/15	12.00	Legal research for and draft motion for reconsideration
Time (hrs):	255.55	Hourly rate: \$250 Total Fees: \$63,887.50

Time Devoted to Fee Claim

DATE	TIME (hrs)	ACTIVITY
9/18/2016	2.50	Legal research: Attorneys fee issues (prevailing party/partial success/amounts awarded); Analyze time sheet and ALJ's decision to determine work for which Parents are entitled to fees;
9/19/2016	4.75	Draft Motion for Attorneys' Fees (and brief); and supporting Declaration of Powers
9/20/2016	4.25	Draft Motion for Attorneys' Fees (and brief)
9/21/2016	2.25	Draft Motion for Attorneys' Fees (and brief)
9/22/2016	3.00	Draft Motion for Attorneys' Fees (and brief); Supporting declaration of Powers; and proposed order
Time (hrs):	16.75	Hourly rate: \$250 Total Fees: \$4,187.50